



September 20, 2024

Via Email steven@rrsfir.com

Steven C. Levatino
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1101 S. Capital of Texas Hwy.
Bldg. K, Suite 125
Austin, Texas 78746

Re: Cause No. 1:23-cv-1042; *The Lutheran Church-Missouri Synod v. Concordia University Texas, Donald Christian and Christopher Bannwolf and John Does 1-12*; In the U.S. District Court for the Western District of Texas, Austin Division

Dear Steven,

Thank you for your letter of September 13, 2024. I have read through it carefully and, as you might imagine, you and I hold different opinions about the law and how it applies to your clients' claims. I will serve amended discovery responses with the sending of this letter.

Next week, I will send a current privilege log of items on which I currently claim privileged. With regard to our search efforts, you sent 23 requests for production seeking either "any communications," "the communications," "any correspondence," "the correspondence," and "all correspondence" related to numerous topics from numerous individuals. As a result, we have retained a digital discovery firm to help search for responsive documents in the various email domains. The initial download identified 2,474,472 documents. We have taken steps to exclude documents that are clearly not responsive and are whittling down the number of documents which we will have to review. Unfortunately, due to the number of custodians, the topics and the time periods, it is a labor-intensive project, and I cannot accurately tell you when I will be finished.

Sincerely,

Richards Rodriguez & Skeith, LLP

/s/ Daniel R. Richards

Daniel R. Richards

Enclosures as stated